

**Hughes
Hubbard
& Reed**

Hughes Hubbard & Reed LLP
One Battery Park Plaza
New York, New York 10004-1482
Office: +1 (212) 837-6000
Fax: +1 (212) 422-4726
hugheshubbard.com

Marc A. Weinstein
Partner
Direct Dial: +1 (212) 837-6460
Direct Fax: +1 (212) 299-6460
marc.weinstein@hugheshubbard.com

July 13, 2022

VIA EMAIL & ECF

Honorable Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Gilbert Armenta, 17 Cr. 556 (ER)

Dear Judge Ramos:

On behalf of Gilbert Armenta, we respectfully submit this request seeking a modification of Mr. Armenta's bail conditions to permit Mr. Armenta to leave his apartment from 10:00 a.m. to 2:00 p.m. on Mondays through Saturdays each week. Neither the Government nor the supervising Pre-trial Services Office objects to this request.

On July 19, 2019, Mr. Armenta was remanded to the Metropolitan Correctional Center. On March 25, 2020, the Court released Mr. Armenta, and imposed a condition of home confinement as part of his release, which condition exists to this day. Mr. Armenta has been in compliance with the conditions imposed by the Court for more than two years now. Mr. Armenta awaits sentencing. The parties have been seeking adjournments of Mr. Armenta's sentencing in order to permit the sentencing in *United States v. Mark S. Scott*, S10 17 Cr. 630 (ER) to proceed first, and contemplate seeking a similar adjournment of the upcoming sentencing date. As a result of the extended period of time during which Mr. Armenta has been and will be awaiting sentencing subject to home confinement, we request the above-mentioned modification of his conditions of home confinement in order to permit Mr. Armenta to spend four hours per day, six days per week, outside of his apartment. Neither the Government nor the Pretrial Services Office seeks any additional terms with respect to such periods of time outside the home.

We further request that, to the extent Mr. Armenta has good cause to leave his residence, such as for a medical appointment, outside of the allotted four-hour period, and only to the extent such an appointment is scheduled between the hours of 9:00 a.m. and 6:00 p.m., that Mr. Armenta be permitted to shift the four-hour period on that given day to accommodate such an

Honorable Edgardo Ramos
July 13, 2022

2

appointment upon notice to and approval by the supervising Pre-trial Services Office, but without the need for Court approval of a modification to his bail conditions. I have confirmed that neither the Government nor Pre-trial Services objects to this additional modification.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'M. Weinstein', written over a horizontal line.

Marc A. Weinstein

cc: AUSA Christopher DiMase
AUSA Nicholas Folly
AUSA Michael McGinnis
AUSA Juliana Murray
Senior Probation Officer Garry Hackett